

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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MOSAID TECHNOLOGIES INCORPORATED,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
SAMSUNG SEMICONDUCTOR, INC., and  
SAMSUNG AUSTIN SEMICONDUCTOR, L.P.

Defendants.

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INFINEON TECHNOLOGIES NORTH  
AMERICA CORP.

Plaintiff,

v.

MOSAID TECHNOLOGIES, INC.,

Defendant.

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MOSAID TECHNOLOGIES INCORPORATED,

Counterclaimant,

v.

INFINEON TECHNOLOGIES NORTH  
AMERICA CORP.,

INFINEON TECHNOLOGIES AG,

INFINEON TECHNOLOGIES HOLDING  
NORTH AMERICA CORP., and

INFINEON TECHNOLOGIES RICHMOND LP,

Counterdefendants.

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Civil Action No. 01-4340 (WJM)  
*District of New Jersey*

*CONSOLIDATED WITH*

Civil Action No. 02-5722 (JF/RS)  
*Northern District of California*

**NOTICE OF MOTION**

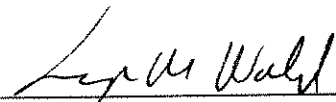
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**PLEASE TAKE NOTICE** that on April 26, 2004 at 9:00 a.m, in accordance with Judge Hedges' rulings during the March 18, 2004 Status Conference, counsel for Plaintiff, MOSAID Technologies Incorporated ("MOSAID"), shall move the Honorable Ronald J. Hedges, U.S.M.J., at the United States District Court for the District of New Jersey, M.L. King Jr. Federal Building, 50 Walnut Street, Newark, New Jersey, for an Order for sanctions against Defendants, Samsung Electronics Co., LTD., Samsung Electronics America, Inc., Samsung Semiconductor, Inc. and Samsung Austing Semiconductor, L.P. ("Samsung") pursuant to Federal Rules of Civil Procedure 16(f) and 37(b)(2) and the inherent powers of the Court.

**PLEASE TAKE FURTHER NOTICE** that MOSAID will rely upon the submitted Brief and the supporting Declarations of Dr. Laurence Nagel, Scott W. Burt, and supporting Certifications of Robert Lindefeld, and Agnes Antonian. A proposed form of Order is also submitted.

Dated: April 5, 2004

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